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June 27, 2025

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By ECF

The Honorable Victoria Reznik
United States Magistrate Judge
Southern District of New York
The Hon. Charles L. Brieant Jr. Federal Building
300 Quarropas St., Courtroom 420
White Plains, NY 10601-4150
ReznikNYSDChambers@nysd.uscourts.gov

Re: *The Wave Studio, LLC v. General Hotel Management Ltd. et al.*, Case No. 7:13-cv-09239-CS-VR

Dear Judge Reznik:

We write on behalf of Defendants Despegar.com Corp. and Despegar.com USA, Inc. (collectively the “Despegar Defendants”) in the above-referenced action (the “Action”). The Despegar Defendants are represented by James A. Trigg and Briggs M. Wright of Kilpatrick Townsend & Stockton LLP, both of whom appear as counsel of record on the docket in the Action and in the consolidated action Case No. 7:23-cv-03586.

We write further to the Court’s June 20, 2025 Order to inform Your Honor that, with respect to the issues set forth in Plaintiff’s June 18, 2025 letter (Dkt. 528), the Despegar Defendants (a) take no position on the topic set forth in Section I regarding the role of the operative complaint in the Action with respect to the complaints in the respective consolidated actions; (b) take no position on Section II of the letter, which does not apply to the Despegar Defendants; (c) confirm their appearance in this Action as discussed above; and (d) remain open in principle to settlement, but view a status conference as premature at this time given the motions to dismiss currently pending in the Action.

Respectfully,

/James A. Trigg/

James A. Trigg

cc: All counsel of record (by ECF)